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AEROJET ROCKETDYNE, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CGI FEDERAL, INC.,

Plaintiff,

vs.

AEROJET ROCKETDYNE, INC.,

Defendant.

Case No. 2:20-cv-01781-JAM-KJN

**STIPULATION AND ORDER TO
FURTHER MODIFY PRETRIAL
DEADLINES**

AND RELATED CROSS-CLAIM

Plaintiff and Counterclaim-Defendant CGI Federal, Inc. (“CGI”), on the one hand, and Defendant and Counterclaimant Aerojet Rocketdyne, Inc. (“AR”), on the other hand, by and through their respective counsel of record, hereby enter into the following stipulation and mutually request the Court enter an order, pursuant to Federal Rule of Civil Procedure 16(b)(4), in accordance herewith:

1 1. CGI commenced the instant action on September 3, 2020, and filed the
2 operative First Amended Complaint (“FAC”) on November 18, 2020. AR answered the FAC
3 and asserted counterclaims against CGI on December 8, 2020, then filed its First Amended
4 Answer to the FAC and counterclaims on January 11, 2021. CGI answered AR’s
5 counterclaims on December 24, 2020, and filed its First Amended Answer on January 25,
6 2021.

7 2. On February 17, 2021, the Court issued its initial Pretrial Scheduling
8 Order. On October 20, 2021, pursuant to the parties’ stipulation, the Court issued an order on
9 the parties’ Amended Stipulation To Amend Pretrial Scheduling Order (Dkt. #46). The
10 parties requested and received further modifications to the pretrial schedule on April 15, 2022
11 (ECF 50) and on October 14, 2022 (ECF 52). Currently, the expert witness disclosure
12 deadline is August 4, 2023, the deadline for completion of all discovery is September 29,
13 2023 and trial is scheduled to start on April 8, 2024 (Stipulation and Order to Modify Pretrial
14 Deadlines, Dkt. #52.)

15 3. As previously described, the parties have diligently discharged their
16 respective discovery obligations, both before and after issuance of the Amended Pretrial
17 Scheduling Order issued on October 14, 2022. The parties have worked through discovery
18 disputes on their own and without court intervention.

19 4. The parties have engaged in settlement discussions, but such party-to-
20 party negotiations have stalled. However, the parties remain committed to meaningful
21 discussions and are in the process of engaging a mediator to assist in these efforts. The
22 parties expect that mediation will occur and conclude in Fall 2023.

23 5. Current deadlines are fast approaching. Given the parties’ diligence and
24 continued good faith efforts to conserve judicial resources by attempting to resolve the case,
25 good cause exists to modify the current Amended Pretrial Scheduling Order (Dkt. #52) to
26 prevent the parties from being unfairly prejudiced and from expending unnecessary resources
27 absent a continuance of the existing deadlines in this case. The parties believe their
28 considerable progress since the issuance of the October 14, 2022 Amended Pretrial

Scheduling Order justifies the continuance of discovery deadlines sought herein.

NOW, THEREFORE, based on the foregoing, and subject to the Court's approval, the parties stipulate and agree that all existing discovery deadlines should be continued as follows:

Event	Current Deadline	Proposed New Deadline
Expert Witness Disclosures	8/4/2023	03/01/2024
Rebuttal / Supplemental Expert Disclosures	9/1/2023	03/15/2024
Joint Mid-Litigation Statement Filing Deadline	9/15/2023	04/12/2024
Discovery Completion Deadline ¹	9/29/2023	04/26/2024
Deadline to meet and confer on whether there will be cross-motions for summary judgment	10/10/2023	05/21/2024
Deadline to file dispositive motions	11/10/2023	06/21/2024
Hearing on dispositive motions	1/9/2024	08/20/24 1:30 p.m.
Final Pretrial Conference	2/23/2024	10/18/2024 10:00 a.m.
Jury Trial (7-10 days)	4/8/2024	12/02/2024 9:00 a.m.

Dated: July 6, 2023

ROGERS JOSEPH O'DONNELL

By: /s/ Lauren Kramer Sujeeth
LAUREN KRAMER SUJEETH
Attorneys for Plaintiff/Counterclaim Def.
CGI FEDERAL INC.

Dated: July 6, 2023

HUNTON ANDREWS KURTH LLP

By: /s/ Kirk A. Hornbeck
KIRK A. HORNBECK
(as authorized on July 6, 2023)
Attorneys for Defendant/Counterclaimant
AEROJET ROCKETDYNE INC.

¹ In this context, "completion" means that all discovery shall have been conducted so that all depositions have been taken and any disputes relative to discovery shall have been resolved by appropriate order if necessary and, where discovery has been ordered, the order has been complied with.

ATTESTATION

I, Lauren Kramer Sujeeth, am the ECF user whose ID and password are being used to file this document. In compliance with Local Rule 131(e), I attest that concurrence in the filing of the document has been obtained from the other signatory.

Dated: July 6, 2023

/s/ Lauren Kramer Sujeeth
LAUREN KRAMER SUJEETH

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ORDER MODIFYING PRETRIAL SCHEDULING ORDER

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

Event	Current Deadline	New Deadline
Expert Witness Disclosures	8/4/2023	03/01/2024
Rebuttal / Supplemental Expert Disclosures	9/1/2023	03/15/2024
Joint Mid-Litigation Statement Filing Deadline	9/15/2023	04/12/2024
Discovery Completion Deadline	9/29/2023	04/26/2024
Deadline to meet and confer on whether there will be cross-motions for summary judgment	10/10/2023	05/21/2024
Deadline to file dispositive motions	11/10/2023	06/21/2024
Hearing on dispositive motions	1/9/2024	08/20/2024, at 1:30 p.m.²
Final Pretrial Conference	2/23/2024	10/18/2024, at 10:00 a.m.
Jury Trial (7-10 days)	4/8/2024	12/02/2024, at 9:00 a.m.

Counsel **SHALL** contact Judge Mendez' courtroom deputy, M York, via e-mail at myork@caed.uscourts.gov, prior to filing a stipulation and proposed order to continue the dates set forth in this order.

IT IS SO ORDERED.

Dated: July 06, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE

² Calendars are subject to last minute changes. Contact the Courtroom Deputy for available dates.